

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM A. CHAMBERS, *et al.*,

Plaintiffs,

V.

CHESAPEAKE APPALACHIA,
L.L.C., *et al.*,

Defendants.

No. 3:18-cv-00437

(Judge Mariani)

**JOINT MOTION OF PLAINTIFFS AND DEFENDANT EQUINOR USA
ONSHORE PROPERTIES, INC. TO EXTEND CASE DEADLINES**

Plaintiffs and defendant Equinor USA Onshore Properties, Inc. (the “Moving Parties”) respectfully move the Court for an order extending the deadlines and resetting the trial schedule in this case. In support of this motion, the Moving Parties state the following:

1. The existing Case Management Order (ECF No. 89) set a discovery deadline in this action for March 11, 2021.
2. Ongoing complications stemming from the current COVID-19 situation, including stay-at-home orders affecting counsel, the parties, witnesses, and experts

have hampered the Moving Parties' efforts to complete the deposition of third party Equinor Natural Gas, LLC ("ENG"), the only outstanding deposition in the case.

3. ENG's designee was previously scheduled to testify on February 26, 2021, but was unable to due to a COVID-19 diagnosis. Accordingly, the Moving Parties believe that an additional two weeks will be required to allow the remaining deposition to be completed.

4. Counsel for the Moving Parties have conferred in this matter and agree with and jointly move for the relief requested.

WHEREFORE, the Moving Parties jointly move for an order extending deadlines as currently stated in the Case Management Order as follows:

(1) The fact discovery deadline shall be extended from March 11, 2021, until March 25, 2021, to allow completion of ENG's designee's deposition; all remaining fact discovery to be complete by March 11, 2021.

(2) Plaintiffs shall comply with the requirements of Federal Rule of Civil Procedure 26(a)(2) with respect to expert witnesses regarding Counts V and VI of the Second Amended Complaint no later than April 1, 2021.

(3) Supplementations regarding Counts V and VI of the Second Amended Complaint shall be due by May 20, 2021.

(4) Disclosures required by Federal Rule of Civil Procedure 26(a)(3)

regarding Counts V and VI of the Second Amended Complaint shall be made no later than June 10, 2021.

(5) All potentially dispositive motions regarding Counts V and VI of the Second Amended Complaint, with supporting briefs, exhibits, and statements of material facts, shall be filed no later than June 10, 2021.

(6) Expert discovery regarding Counts V and VI of the Second Amended Complaint shall be completed by June 18, 2021.

Respectfully submitted,

/s/ Joseph Samuels

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